

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AURELIUS CAPITAL PARTNERS, LP and
AURELIUS CAPITAL MASTER, LTD.,

Plaintiffs,

v.

THE REPUBLIC OF ARGENTINA,

Defendant.

No. 07 Civ. 2715 (TPG)

AURELIUS CAPITAL PARTNERS, LP and
AURELIUS CAPITAL MASTER, LTD.,

Plaintiffs,

v.

THE REPUBLIC OF ARGENTINA,

Defendant.

No. 07 Civ. 11327 (TPG)

BLUE ANGEL CAPITAL I LLC,

Plaintiff,

v.

THE REPUBLIC OF ARGENTINA,

Defendant.

No. 07 Civ. 2693 (TPG)

(captions continue on the following pages)

NOTICE OF CROSS-MOTION TO QUASH SUBPOENAS
SERVED ON BARCLAYS BANK PLC AND BARCLAYS CAPITAL INC.

AURELIUS CAPITAL MASTER, LTD. and
ACP MASTER, LTD.,

Plaintiffs,

v.

THE REPUBLIC OF ARGENTINA,

Defendant.

No. 09 Civ. 8757 (TPG)

AURELIUS CAPITAL MASTER, LTD. and
ACP MASTER, LTD.,

Plaintiffs,

v.

THE REPUBLIC OF ARGENTINA,

Defendant.

No. 09 Civ. 10620 (TPG)

AURELIUS OPPORTUNITIES FUND II, LLC and
AURELIUS CAPITAL MASTER, LTD.,

Plaintiffs,

v.

THE REPUBLIC OF ARGENTINA,

Defendant.

No. 10 Civ. 1602 (TPG)

AURELIUS OPPORTUNITIES FUND II, LLC and
AURELIUS CAPITAL MASTER, LTD.,

Plaintiffs,

v.

THE REPUBLIC OF ARGENTINA,

Defendant.

No. 10 Civ. 3507 (TPG)

AURELIUS CAPITAL MASTER, LTD. and
AURELIUS OPPORTUNITIES FUND II, LLC,

Plaintiffs,

v.

THE REPUBLIC OF ARGENTINA,

Defendant.

No. 10 Civ. 3970 (TPG)

BLUE ANGEL CAPITAL I LLC,

Plaintiff,

v.

THE REPUBLIC OF ARGENTINA,

Defendant.

No. 10 Civ. 4101 (TPG)

BLUE ANGEL CAPITAL I LLC,

Plaintiff,

v.

THE REPUBLIC OF ARGENTINA,

Defendant.

No. 10 Civ. 4782 (TPG)

AURELIUS CAPITAL MASTER, LTD. and
AURELIUS OPPORTUNITIES FUND II, LLC,

Plaintiffs,

v.

THE REPUBLIC OF ARGENTINA,

Defendant.

No. 10 Civ. 8339 (TPG)

PLEASE TAKE NOTICE that upon the declarations of Lance Croffoot-Suede and Solomon Kibriye dated November 7, 2012, all attached exhibits, and the accompanying Memorandum of Law, non-parties Barclays Bank PLC and Barclays Capital Inc. ("Barclays") will move this Court, pursuant to Federal Rule of Civil Procedure 45, for an order quashing the subpoenas dated December 13, 2011 served by plaintiffs on non-parties Barclays, and for such relief as this Court deems just and proper.

Dated: New York, New York
November 7, 2012

Respectfully submitted,

LINKLATERS LLP

By: s/ Lance Croffoot-Suede
Lance Croffoot-Suede
(lance.croffoot-suede@linklaters.com)
Titia Holtz
Sterling P.A. Darling, Jr.
1345 Avenue of the Americas,
New York, NY 10105
(212) 903-9000
(212) 903-9100 (fax)

*Attorneys for Barclays Bank PLC
and Barclays Capital Inc.*

TO:

Emily A. Stubbs (estubbs@fldaw.com)
Friedman Kaplan Seiler & Adelman LLP
7 Times Square
New York, New York 10036

Attorneys for Plaintiffs